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[Redacted]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

ORACLE AMERICA, INC., ORACLE
INTERNATIONAL CORPORATION, and
TEXTURA CORPORATION.

Plaintiffs,

vs.

**PROCORE TECHNOLOGIES, INC.,
PROCORE PAYMENT SERVICES, INC.,
AND MARK MARIANO**

Defendant

Case No. 4:24-cv-07457-JST

**JOINT STIPULATION AND [PROPOSED]
ORDER MODIFYING BRIEFING
SCHEDULE AND HEARING DATE FOR
PROCORE'S MOTION TO COMPEL
PARTICULARIZED TRADE SECRET
DISCLOSURE (DKT. 174)**

1 Pursuant to Civil Local Rules 6-2 and 7-12, and the Court's December 7, 2025 Order (Dkt.
 2 178), Plaintiffs Oracle America, Inc., Oracle International Corporation, and Textura Corporation
 3 ("Oracle") and Defendants Procore Technologies, Inc. and Procore Payment Services, Inc.
 4 ("Procore") by and through their undersigned counsel, hereby jointly stipulate and agree, subject to
 5 the approval of the Court, as follows:

6 WHEREAS, Procore filed a Motion to Compel Particularized Trade Secret Disclosure by
 7 Oracle ("Motion") (Dkt. 174);

8 WHEREAS, the Opposition to this Motion is due on December 9, 2025, the Reply in support
 9 of this Motion is due on December 16, 2025, and the hearing for this Motion is set for January 8,
 10 2026 at 9:30 a.m.;

11 WHEREAS, the parties request that the deadline for the Opposition be extended by 7 days
 12 to December 16, 2025, the deadline for the Reply be extended to December 30, 2025, and the hearing
 13 for the Motion be rescheduled to January 15, 2026 at 9:30 a.m. (which appears open on the Court's
 14 calendar). The parties request the extensions in view of commitments over the Holidays and because
 15 the majority of Oracle's counsel of record (including Adam Alper, Michael De Vries, Akshay
 16 Deoras, and Kendra Delaney) have a pretrial conference scheduled for December 9, 2025—the same
 17 day as the current Opposition deadline—in *Applied Materials, Inc. v. Demaray*, Case No. 5:20-cv-
 18 09341-EJD (N.D. Cal.). This pretrial conference was set on March 28, 2025, prior to Procore filing
 19 its Motion. *Id.*, Dkt. No. 495. In view of the parties' agreement for an extension to Oracle's
 20 Opposition deadline, the parties also agree to a commensurate extension to Procore's Reply
 21 deadline;

22 WHEREAS, the first modification of time in this case was the parties' stipulation that
 23 provided a 30-day extension for Procore Technologies, Inc. and Procore Payment Services, Inc. and
 24 a 25-day extension for Mr. Mariano to respond to Plaintiffs' Complaint (Dkt. 30) such that
 25 Defendants' deadline to respond to the Complaint was extended to December 20, 2024;

26 WHEREAS, the second modification of time in this case was the Court's Order granting the
 27 parties' stipulation to extend the deadline to file Oppositions to Defendant Mark Mariano's Motion
 28 to Compel Arbitration and to Stay Proceedings Pending Arbitration or Alternative Motion to

1 Dismiss (Dkt. 38) and Defendants Procore Technologies, Inc. and Procore Payment Services, Inc.'s
 2 Motion to Stay Pending Arbitration of Claims against Mr. Mariano or Alternative Motion to Dismiss
 3 (Dkt. 40) to January 24, 2025, the deadline to file Replies in support of these Motions to February
 4 7, 2025, and to reschedule the hearings for these Motions to March 6, 2025 (Dkt. 42);

5 WHEREAS, the third modification of time in this case was the parties' stipulation that
 6 provided a 14-day extension for Defendants to respond to Plaintiffs' Complaint (Dkt. 80), such that
 7 Defendants' deadline to respond to the Complaint was extended to May 7, 2025;

8 WHEREAS, this extension will not alter the date of any event or any deadline already fixed
 9 by Court Order;

10 WHEREAS, the Court has not previously stated that no further extensions will be granted.
 11 Entry and modification of the above deadlines will not impact any other scheduling order deadlines;

12 NOW THEREFORE, the Parties hereby stipulate and request that the Court permit the
 13 following adjustments:

Deadline/Event	Current Deadline	Modification
Oracle's Opposition to Motion	December 9, 2025	December 16, 2025
Procore's Reply in Support of Motion	December 16, 2025	December 30, 2025
Hearing on Motion	January 8, 2026 @ 9:30 a.m.	January 15, 2026 @ 9:30 a.m.

18 DATED: December 8, 2025

19 /s/ Ingrid Petersen
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35 *Attorneys for Defendants Procore Technologies,
 36 Inc., and Procore Payments Services, Inc.*

1 **SIGNATURE ATTESTATION**

2 Pursuant to Civil Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this
3 document has been obtained from the other signatory.

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5 Dated: December 8, 2025

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11 */s/ Ingrid Petersen*
Ingrid Petersen

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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3 Dated: _____
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Honorable Laurel Beeler
United States Magistrate Judge